

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF EASTERN PENNSYLVANIA**

In Re:) Case No: 21-11650-PMM
)
Sandra Anne Wagner,)
) Chapter 13
Debtor.)

DEBTOR'S RESPONSE TO CREDITOR'S MOTION TO FOR RELIEF

AND NOW comes the Debtor, Sandra Anne Wagner, by and through her undersigned counsel, with this Response to the Creditor: The Bank of New York Mellon, as successor Trustee f/b/o holders of Structured Asset Mortgage Investments II Inc., Bear Stearns ALT-A Trust 2006-2, Mortgage Pass-Through Certificates, Series 2006-2 and avers as follows:

The Debtor admits to falling behind on her post-petition mortgage payments. The Debtor was recently hospitalized with issues stemming from diabetes and atrial fibrillation which prevent her from working normal hours. The Debtor is out of the hospital and ready to resume normal payments.

The Debtor apologizes for this late submission and requests that the post-petition arrears be recapitalized into her bankruptcy plan.

WHEREFORE, the Debtor respectfully requests the Court enter an Order DENYING the Creditor's motion for relief.

Dated: February 24, 2022

Respectfully Submitted,

/s/ James DiMaggio
James DiMaggio, Esq.
Attorney ID No. 53361
1000 Maplewood Drive
Suite 202
Maple Shade, NJ 08052
Tel. (856) 831-7119
Attorney for the Debtor